

Goss ■ Samford PLLC

        Attorneys at Law

January 21, 2014

RECEIVED
JAN 21 2014
PUBLIC SERVICE
COMMISSION

Mr. Jeff Derouen
Executive Director
Kentucky Public Service Commission
P.O. Box 615
211 Sower Boulevard
Frankfort, KY 40602

Re: Case No. 2013-00324

Dear Mr. Derouen:

Please find enclosed for filing with the Commission in the above-referenced case an original and ten copies of East Kentucky Power Cooperative, Inc.'s Motion for Submission for Adjudication Without a Hearing.

Please contact me if you have any questions.

Very truly yours,



Mark David Goss
Counsel

Enclosures

Cc: Parties of Record

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED

JAN 21 2014

**PUBLIC SERVICE
COMMISSION**

IN THE MATTER OF:

**AN EXAMINATION BY THE PUBLIC SERVICE)
COMMISSION OF THE ENVIRONMENTAL)
SURCHARGE MECHANISM OF EAST KENTUCKY)
POWER COOPERATIVE, INC. FOR THE)
TWO-YEAR BILLING PERIOD ENDING JUNE 30, 2013)
AND THE PASS THROUGH MECHANISM)
FOR ITS SIXTEEN MEMBER DISTRIBUTION)
COOPERATIVES)**

**CASE NO.
2013-00324**

**EAST KENTUCKY POWER COOPERATIVE, INC.'S
MOTION FOR SUBMISSION FOR ADJUDICATION ON THE EXISTING CASE
RECORD WITHOUT A HEARING**

Comes now East Kentucky Power Cooperative, Inc. ("EKPC"), by and through counsel, and moves the Kentucky Public Service Commission ("Commission") to accept its request for submitting the case for adjudication on the existing case record without a hearing. EKPC is also filing this Motion on behalf of each of its 16 Member Distribution Cooperatives, all of which are parties to this proceeding. The Member Distribution Cooperatives are: Big Sandy Rural Electric Cooperative Corporation; Blue Grass Energy Cooperative Corporation; Clark Energy Cooperative, Inc.; Cumberland Valley Electric, Inc.; Farmers Rural Electric Cooperative Corporation; Fleming-Mason Energy Cooperative; Grayson Rural Electric Cooperative Corporation; Inter-County Energy Cooperative Corporation; Jackson Energy Cooperative; Licking Valley Rural Electric Cooperative Corporation; Nolin Rural Electric Cooperative Corporation; Owen Electric Cooperative; Salt River Electric Cooperative Corporation; Shelby Energy Cooperative, Inc.; South Kentucky Rural Electric Cooperative Corporation; and Taylor County Rural Electric Cooperative Corporation.

In support of this Motion, EKPC states that the Commission entered an Order on September 18, 2013, opening this two-year review proceeding. The procedural schedule required EKPC and its Member Distribution Cooperatives to respond to initial data requests on October 18, 2013. The procedural schedule allowed for Commission Staff to serve additional data requests on EKPC and its Member Distribution Cooperatives no later than November 13, 2013. Commission Staff did serve additional data requests on EKPC and its Member Distribution Cooperatives on November 12, 2013. EKPC and its Member Distribution Cooperatives have filed responses to the Commission Staff's additional data requests.

The procedural schedule allowed for intervenor testimony and discovery; however, there are no intervenors in this proceeding. The procedural schedule requires that EKPC and its Member Distribution Cooperatives either request a hearing or request to submit the case for decision based on the record by January 20, 2014. As the Commission's offices are closed on January 20, 2014 in recognition of the Martin Luther King, Jr. birthday, pursuant to 807 KAR 5:001, Section 7(b), EKPC and its Member Distribution Cooperatives are submitting this Motion on January 21, 2014.

EKPC and its Member Distribution Cooperatives believe the case record is complete and this case can be submitted for adjudication on the existing record without a hearing.

WHEREFORE, EKPC respectfully requests that the Commission accept for submission this case for Adjudication on the Existing Record Without a Hearing.

Dated this 21st day of January 2014.

Respectfully submitted,

Mark David Goss 

Mark David Goss

GOSS SAMFORD, PLLC

2365 Harrodsburg Road

Suite B-325

Lexington, KY 40504

(859) 368-7740

mdgoss@gosssamfordlaw.com

Counsel for East Kentucky Power Cooperative, Inc.

CERTIFICATE OF SERVICE

This will certify that a true and correct copy of the foregoing was served, by depositing same in the custody and care of the U.S. Mail, postage pre-paid, on this 21st day of January 2014, addressed to the following:

Allen Anderson
President & CEO
South Kentucky R.E.C.C.
925-929 N. Main Street
P. O. Box 910
Somerset, KY 42502-0910

Larry Hicks
President & CEO
Salt River Electric Cooperative Corp.
111 West Brashear Avenue
P. O. Box 609
Bardstown, KY 40004

Anthony S Campbell
President & CEO
East Kentucky Power Cooperative, Inc.
4775 Lexington Road
P. O. Box 707
Winchester, KY 40392-0707

Kerry K Howard
CEO
Licking Valley R.E.C.C.
P. O. Box 605
271 Main Street
West Liberty, KY 41472

Paul G Embs
President & CEO
Clark Energy Cooperative, Inc.
2640 Ironworks Road
P. O. Box 748
Winchester, KY 40392-0748

James L Jacobus
President & CEO
Inter-County Energy Cooperative Corp
1009 Hustonville Road
P. O. Box 87
Danville, KY 40423-0087

David Estep
President & General Manager
Big Sandy R.E.C.C.
504 11th Street
Paintsville, KY 41240-1422

Debbie J Martin
President & CEO
Shelby Energy Cooperative, Inc.
620 Old Finchville Road
Shelbyville, KY 40065

Carol Ann Fraley
President & CEO
Grayson R.E.C.C.
109 Bagby Park
Grayson, KY 41143

Michael L Miller
President & CEO
Nolin R.E.C.C.
411 Ring Road
Elizabethtown, KY 42701-6767

Ted Hampton
Manager
Cumberland Valley Electric, Inc.
Highway 25E
P. O. Box 440
Gray, KY 40734

Barry L Myers
Manager
Taylor County R.E.C.C.
625 West Main Street
P. O. Box 100
Campbellsville, KY 42719

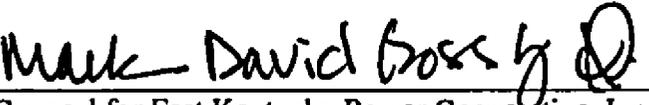
Christopher S Perry
President & CEO
Fleming-Mason Energy Cooperative, Inc.
1449 Elizaville Road
P. O. Box 328
Flemingsburg, KY 41041

Bill Prather
President & CEO
Farmers R.E.C.C.
504 South Broadway
P. O. Box 1298
Glasgow, KY 42141-1298

Mark Stallons
President & CEO
Owen Electric Cooperative, Inc.
8205 Highway 127 North
P. O. Box 400
Owenton, KY 40359

Mike Williams
President & CEO
Blue Grass Energy Cooperative Corp.
1201 Lexington Road
P. O. Box 990
Nicholasville, KY 40340-0990

Carol Wright
President & CEO
Jackson Energy Cooperative Corporation
115 Jackson Energy Lane
McKee, KY 40447


Mark David Bossy
Counsel for East Kentucky Power Cooperative, Inc.